

REMARKS

Claims 46, 72 and 82 have been amended. Claims 49-71, 80, 81 and 85-91 have been canceled. Claims 92-104 have been newly added. No new matter has been included. Claims 46-48, 72-79, 82-84 and 92-104 are now pending in this application.

Claims 46-48, 72-79 and 82-84 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Deans et al. (U.S. Publication No. 2003/0208364) ("Deans"). The rejection is respectfully traversed.

The present invention relates to a method, system and article of manufacture for delivering a postal mailpiece. The present invention uses a method that incorporates the steps of detecting a proxy address on the postal mailpiece, using the detected proxy addresses and associated recipient proxy addresses, and delivering the mailpiece to the physical address associated with the obtained recipient postal address. The proxy addresses comprise mnemonics or intuitive elements that relate to the recipient.

Deans relates to a method for providing a physical item such that an indirect address code is added to physical item, subsequently evaluated into a deliverable address, and associated to the item to enable delivery of the item. Deans specifically discloses an indirect address code (IAC) that is defined by a unique set of characters that can be evaluated into a fully specified deliverable address only through the use of a reference table.

Moreover, Deans' IAC comprises a unique set of characters that have no human discernable indication of the deliverable address. On the other hand, the proxy addresses of the claimed invention comprise "mnemonics or intuitive elements that

relate to the recipient," in other words, addresses that are humanly discernable and intuitively understandable.

Finally, in the Office Action, the meaning of mnemonic is not correctly understood. The Office Action indicates that Deans uses mnemonics because the address "appears capable of being remembered, particularly since it may be used for very long periods of time." (Office Action at 2-3). A mnemonic, however, is known as a system or word that is designed to assist memory, such as a rhyme or formula used as an aid in remembering. See AMERICAN HERITAGE DICTIONARY 805 (2d college ed. 1982). The fact that the IAC is used for very long periods of time does not have anything to do with mnemonics. Deans needs to show that the IAC is set up as a memory aid. No such description is found for the IAC. Thus, the present invention is distinct over Deans.

Amended claim 46, *inter alia*, recites "detecting a proxy address on the postal mailpiece wherein said proxy address is defined by a set of presentation protocols that distinguish said proxy address from other addresses, . . . wherein said set of presentation protocols comprise mnemonics or intuitive elements that relate to the recipient." Claim 72, *inter alia*, recites "a computer readable storage medium, said storage medium comprising a database of proxy addresses and associated recipient postal addresses, . . . wherein said proxy addresses comprise mnemonics or intuitive elements that relate to the recipient." Claim 82, *inter alia*, recites a control program comprising the step of "detecting a proxy address on a postal mailpiece, said proxy addresses comprising mnemonics or intuitive elements that relate to the recipient." Deans does not disclose such limitations.

Consequently, claims 46, 72 and 82 are allowable. Claims 47 and 48 depend from claim 46 and are allowable along with claim 46. Claims 73-79 depend from claim

72 and are allowable along with claim 72. Claims 83 and 84 depend from claim 82 and are allowable along with claim 82.

Accordingly, Applicants respectfully submit that Deans fails to make a prima facie showing of anticipation under § 102(e). Applicants respectfully request that the rejection be withdrawn and claims 46-48, 72-79 and 82-84 allowed.

Additionally, newly added claims 92-102 recite that the proxy addresses “are created, modified and updated by the recipient.” The present invention allows the recipient to create, modify and update their own proxy addresses as well as the relationship between each proxy address and its corresponding postal address. Deans does not disclose such limitations.

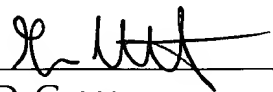
Deans discloses an IAC that is typically assigned and maintained by the secure provider. Within Deans’ process, the user fills out a “Request for an IAC” or similar form, including at least one deliverable address and the remainder of the process is done by the secure provider. (page 3, paragraphs 27-28). Thus, the recipient, in Deans, is forced to accept a random, obscure computer-generated IAC produced by the secure provider. However, within the claimed invention, the proxy addresses are “created, modified and updated by the recipient.” That is to say, the claimed invention allows for personalized proxy addresses and a process that is substantially influenced by the desires of its users. Applicants respectfully submit that Deans does not recite all limitations of the claimed invention and claims 92-102 are thus allowable.

Likewise, newly added claims 103 and 104 recite similar limitations as recited above and are believed to be allowable for at least the same reasons.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

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Respectfully submitted,

By  _____

Jon D. Grossman

Registration No.: 32,699

Gianni Minutoli

Registration No.: 41,198

DICKSTEIN SHAPIRO MORIN &

OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorneys for Applicants